

FILED
IN CLERK'S OFFICE
UNITED STATES DISTRICT COURT
2020 MAY 18 AM 10:33
FOR THE
U.S. DISTRICT COURT
DISTRICT OF MASS.
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, :

v. : Case No. 19-cr-10080

:
MOSSIMO GIANNULLI and LORI
LOUGHLIN, : MOTION FOR A
Defendants. PERMANENT
INJUNCTION

and

ROBERT A. HEGHMANN May 14, 2020
Intervenor.

MOTION FOR A PERMANENT INJUNCTION

Robert A. Heghmann hereby moves for a Permanent Injunction requiring the Department of Justice and the Federal Bureau of Investigation to strictly adhere and and obey the American Bar Association Model Rules of Professional Conduct including, but not limited to, Special Responsibilities of a Prosecutor as adopted by the Washington, D.C. Bar Association and interpreted by Washington, D.C. Courts.

Respectfully submitted,



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LOCAL RULE 7.1(a)(2) CERTIFICATION

I certify that I communicated with counsel for the Government in an attempt to resolve or narrow the issues raised in this motion. The Government takes the position that it opposes this motion.



Robert A. Heghmann

CERTIFICATION

I hereby certify that on May 14, 2020, 2019 I caused a copy of the foregoing document to be served electronically on all Parties through the Court's CM/ECF system by mailing a copy to the Clerk of the Court for dissemination.



Robert A. Heghmann